

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

TOPIA TECHNOLOGY, INC.,

Plaintiff,

v.

BOX, INC., SAILPOINT TECHNOLOGIES
HOLDING, INC., and VISTRA CORP.,

Defendants.

Civil Action No. 6:21-cv-01372-ADA

JURY TRIAL DEMANDED

**DECLARATION OF LOWELL D. MEAD IN SUPPORT OF DEFENDANT BOX, INC.'S
MOTION TO SEVER, STAY, AND TRANSFER**

I, Lowell D. Mead, declare and state as follows:

1. I am an attorney at the law firm of Cooley LLP, counsel for Defendant Box, Inc. in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I submit this declaration in support of Defendant Box, Inc.'s Motion to Sever, Stay, and Transfer.

3. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's Preliminary Infringement Contentions for U.S. Patent No. 9,143,561, dated April 14, 2022.

4. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiff's Preliminary Infringement Contentions for U.S. Patent No. 10,067,942, dated April 14, 2022.

5. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiff's Preliminary Infringement Contentions for U.S. Patent No. 10,289,607, dated April 14, 2022.

6. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiff's Preliminary

Infringement Contentions for U.S. Patent 10,642,787, dated April 14, 2022.

7. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiff's Preliminary Infringement Contentions for U.S. Patent No. 10,754,823, dated April 14, 2022.

8. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff's Preliminary Infringement Contentions for U.S. Patent No. 11,003,622, dated April 14, 2022.

9. Attached hereto as Exhibit 7 is a true and correct copy of Satish Asok's LinkedIn profile, available at <https://www.linkedin.com/in/satishasok/>.

10. Attached hereto as Exhibit 8 is a true and correct copy of Griffin Dorman's LinkedIn profile, available at <https://www.linkedin.com/in/griffindorman/>.

11. Attached hereto as Exhibit 9 is a true and correct copy of Matthew Self's LinkedIn profile, available at <https://www.linkedin.com/in/mself/>.

12. Attached hereto as Exhibit 10 is a true and correct copy of Neal Wu's LinkedIn profile, available at <https://www.linkedin.com/in/nealwu/>.

13. Attached hereto as Exhibit 11 is a true and correct copy of Ritik Malhotra's LinkedIn profile, available at <https://www.linkedin.com/in/ritikmalhotra/>.

14. Attached hereto as Exhibit 12 is a true and correct copy of Tanooj Luthra's LinkedIn profile, available at <https://www.linkedin.com/in/tanoojluthra/>.

15. Attached hereto as Exhibit 13 is a true and correct copy of Arnold Goldberg's LinkedIn profile, available at <https://www.linkedin.com/in/arnoldgoldberg/>.

16. Attached hereto as Exhibit 14 is a true and correct copy of Michael R. Manzano's LinkedIn profile, available at <https://www.linkedin.com/in/michaelmanzano/>.

17. Attached hereto as Exhibit 15 is a true and correct copy of Plaintiff's Petition Under 37 C.F.R. § 1.324 to Correct Inventorship for U.S. Patent No. 9,143,561, dated December 17,

2021.

18. Attached hereto as Exhibit 16 is a true and correct copy of Plaintiff's Petition Under 37 C.F.R. § 1.324 to Correct Inventorship for U.S. Patent No. 10,067,942, dated December 17, 2021.

19. Attached hereto as Exhibit 17 is a true and correct copy of Plaintiff's Petition Under 37 C.F.R. § 1.324 to Correct Inventorship for U.S. Patent No. 10,289,607, dated December 17, 2021.

20. Attached hereto as Exhibit 18 is a true and correct copy of Plaintiff's Petition Under 37 C.F.R. § 1.324 to Correct Inventorship for U.S. Patent No. 10,642,787, dated December 17, 2021.

21. Attached hereto as Exhibit 19 is a true and correct copy of Plaintiff's Petition Under 37 C.F.R. § 1.324 to Correct Inventorship for U.S. Patent No. 10,754,823, dated December 17, 2021.

22. Attached hereto as Exhibit 20 is a true and correct copy of Plaintiff's Petition Under 37 C.F.R. § 1.324 to Correct Inventorship for U.S. Patent No. 11,003,622, dated December 17, 2021.

23. Attached hereto as Exhibit 21 is a true and correct copy of John Haager's LinkedIn profile, available at <https://www.linkedin.com/in/john-haager-73829a3b/>.

24. Attached hereto as Exhibit 22 is a true and correct copy of Defendant's Preliminary Invalidity Contentions, dated July 14, 2022.

25. Attached hereto as Exhibit 23 is a true and correct copy of Gibu Thomas's LinkedIn profile, available at <https://www.linkedin.com/in/gibuthomas/>.

26. Attached hereto as Exhibit 24 is a true and correct copy of Tom Rolander's

LinkedIn profile, available at <https://www.linkedin.com/in/tomrolander/>.

27. Attached hereto as Exhibit 25 is a true and correct copy of Adi Ruppin's LinkedIn profile, available at <https://www.linkedin.com/in/adiruppin/>.

28. Attached hereto as Exhibit 26 is a true and correct copy of Steve Lawrence's LinkedIn profile, available at <https://www.linkedin.com/in/steve55/>.

29. Attached hereto as Exhibit 27 is a true and correct copy of George Moromisato's LinkedIn profile, available at <https://www.linkedin.com/in/neurohack/>.

30. Attached hereto as Exhibit 28 is a true and correct copy of David Braginsky's LinkedIn profile, available at <https://www.linkedin.com/in/daveey/>.

31. Attached hereto as Exhibit 29 is a true and correct copy of Eric Uhrhane's LinkedIn profile, available at <https://www.linkedin.com/in/eric-uhrhane/>.

32. Attached hereto as Exhibit 30 is a true and correct copy of David Jeske's LinkedIn profile, available at <https://www.linkedin.com/in/david-jeske-a028/>.

33. Attached hereto as Exhibit 31 is a true and correct copy of Akash Sagar's LinkedIn profile, available at <https://www.linkedin.com/in/akashsagar/>.

34. Attached hereto as Exhibit 32 is a true and correct copy of Lambertus Hesselink's LinkedIn profile, available at <https://www.linkedin.com/in/lambertus-hesselink-7528618/>.

35. Attached hereto as Exhibit 33 is a true and correct copy of Dharmarus Rizal's LinkedIn profile, available at <https://www.linkedin.com/in/dharmarus-rizal-3284924/>.

36. Attached hereto as Exhibit 34 is a true and correct copy of Eric Bjornson's LinkedIn profile, available at <https://www.linkedin.com/in/ericbjornson/>.

37. Attached hereto as Exhibit 35 is a true and correct copy of Walter vonKoch's LinkedIn profile, available at <https://www.linkedin.com/in/wvonkoch/>.

38. Attached hereto as Exhibit 36 is a true and correct copy of a printout of a Google Maps page, retrieved from www.google.com/maps, indicating the distance from Box's Redwood City headquarters to the federal courthouse in Waco, Texas is 1739 miles.

39. Attached hereto as Exhibit 37 is a true and correct copy of a search from expedia.com for flights from Boston to San Francisco on November 3, 2022.

40. Attached hereto as Exhibit 38 is a true and correct copy of a search from expedia.com for flights from Denver to San Francisco on November 3, 2022.

41. Attached hereto as Exhibit 39 is a true and correct copy of a search from expedia.com for flights from New York City (JFK) to San Francisco on November 3, 2022.

42. Attached hereto as Exhibit 40 is a true and correct copy of a search from expedia.com for flights from Seattle-Tacoma to San Francisco on November 3, 2022.

43. Attached hereto as Exhibit 41 is a true and correct copy of a search from expedia.com for flights from Warsaw, Poland to San Francisco on November 3, 2022.

44. Attached hereto as Exhibit 42 is a true and correct copy of a search from expedia.com for flights from Boston to Waco on November 3, 2022.

45. Attached hereto as Exhibit 43 is a true and correct copy of a search from expedia.com for flights from Denver to Waco on November 3, 2022.

46. Attached hereto as Exhibit 44 is a true and correct copy of a search from expedia.com for flights from New York City (JFK) to Waco on November 3, 2022.

47. Attached hereto as Exhibit 45 is a true and correct copy of a search from expedia.com for flights from Seattle-Tacoma to Waco on November 3, 2022.

48. Attached hereto as Exhibit 46 is a true and correct copy of a search from expedia.com for flights from Warsaw, Poland to Waco on November 3, 2022.

49. Attached hereto as Exhibit 47 is a true and correct copy of a search from expedia.com for flights from Las Vegas to San Francisco on November 3, 2022.

50. Attached hereto as Exhibit 48 is a true and correct copy of a search from expedia.com for flights from Las Vegas to Waco on November 3, 2022.

51. Attached hereto as Exhibit 49 is a true and correct copy of a report from Lex Machina showing the number of open cases, including patent cases and cases assigned to Judge Albright, in the Western District of Texas as of July 14, 2022.

52. Attached hereto as Exhibit 50 is a true and correct copy of a report from Lex Machina showing the number of open cases, including patent cases, in the Northern District of California as of July 14, 2022. Exhibit 50 indicates that there were nineteen judges in the Northern District of California as of July 14, 2022.

53. Attached hereto as Exhibit 51 is a true and correct copy of a report from Lex Machina showing the number of cases, including patent cases, that were filed in the Western District of Texas between January 1, 2021 and July 15, 2022.

54. Attached hereto as Exhibit 52 is a true and correct copy of a report from Lex Machina showing the number of cases, including patent cases, that were filed in the Northern District of California between January 1, 2021 and July 15, 2022.

55. Attached hereto as Exhibit 53 is a true and correct copy of a printout of a Google Maps page, retrieved from www.google.com/maps, indicating the distance from Box's Austin, Texas office to the federal courthouse in Austin, Texas is 0.4 miles, or approximately 3 minutes by car.

56. Attached hereto as Exhibit 54 is a true and correct copy of a printout of a Google Maps page, retrieved from www.google.com/maps, indicating the distance from Box's Austin,

Texas office to the federal courthouse in Waco, Texas is 102 miles, or approximately 1 hour and 42 minutes by car.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on July 26, 2022 in Palo Alto, California.

/s/ Lowell D. Mead
Lowell D. Mead